Permit with introductory note

The Environmental Permitting (England & Wales) Regulations 2010

Erith Contractors Limited

Anchor Bay Wharf Installation
Manor Way
Erith
Kent
DA8 2AW

Permit number

EPR/VP3634VJ

Anchor Bay Wharf Installation
Permit number EPR/VP3634VJ

Introductory note

This introductory note does not form a part of the permit

The main features of the permit are as follows.

Anchor Bay Wharf Installation is owned and operated by Erith Contractors Limited. The installation boundary for this permit encompasses a workshop unit, associated wastewater tank and tanker unloading area at the entrance to the workshop. The installation is situated within a wider site owned by Erith Contractors which includes a supporting transport office, lorry parking and three other individually permitted areas. The adjacent permitted areas are for a standard rules asbestos waste transfer station, a permit for the treatment of waste to produce soil, soil substitute and aggregate and a mobile plant license for treatment of soils and contaminated material all of which are not directly linked to this permit.

The permitted activity is for disposal and recovery of hazardous waste. The activity will involve accepting redundant transformers drained of all free-flowing liquids. The transformers will be dismantled and steam cleaned to remove oil and grease residue. The redundant transformers are deemed hazardous due to the residual transformer oils and greases being contaminated with Polychlorinated Biphenyl (PCB). The activity falls subject the Environmental Permitting Regulations 2010 as a Schedule 1 Section 5.3 Part A 1 (a) (ii) for the disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving physico-chemical treatment.

The dismantling and cleaning activity will take place within the workshop in a contained work area, all liquid wastes will be collected within a sump in the work area and transferred directly into the waste water tank. The waste water tank will be emptied frequently by tanker and the liquid transported offsite for disposal. The disassembled transformer and associated parts will be separated into metals and alloys and transported offsite for recovery or disposal. It is anticipated that up to 2,000 tonnes could be processed annually, equating to approximately 18-20 transformers.

There are no discharges to air, land, water or sewer from the activities taking place within the installation boundary.

The status log of the permit sets out the permitting history, including any changes to the permit reference number.

Status log of the permit		
Description	**Date**	**Comments**
Application EPR/VP3634VJ/A001	Duly made 16/06/14	Application to dispose or recover hazardous waste with a capacity exceeding 10 tonnes per day involving physico-chemical treatment
Further information	11/07/14	Details regarding waste water tank storage and containment
Response to schedule 5 request for information	08/09/14	Revised emergency plan, methodologies, risk assessment, project management plan, non-technical summary, site condition report and waste code list.
Response to schedule 5 request for information	08/09/14 & 12/09/14	Revised site plan.
Response to schedule 5 request for information	02/10/14 & 06/10/14	Revised inspection methodology, site plans, check sheets and water wall sealant design.
Response to schedule 5 request for information	17/10/14	Revised site plan. Letter detailing response to Schedule 5 questions. Revised tank design.
Permit determined	20/10/14	Permit issued to Erith Contractors Limited

Other installation permits relating to this installation		
Operator	**Permit number**	**Date of issue**
Erith Contractors Limited	EPR/EB3239DT	04/01/12
Erith Remediation Technologies Limited	EPR/FB3434RA	27/04/12
Erith Remediation Technologies Limited	EPR/DP3190EQ	06/01/05

End of introductory note

Permit

The Environmental Permitting (England and Wales) Regulations 2010

Permit number
EPR/VP3634VJ

The Environment Agency hereby authorises, under regulation 13 of the Environmental Permitting (England and Wales) Regulations 2010

Erith Contractors Limited ("the operator"),

whose registered office is

Erith House
7 Queen Street
Erith
Kent
DA8 1RP

company registration number **01102060**

to operate an installation at

Anchor Bay Wharf Installation
Manor Way
Erith
Kent
DA8 2AW

to the extent authorised by and subject to the conditions of this permit.

Name	Date
M Bischer	**20/10/2014**

Authorised on behalf of the Environment Agency

Conditions

1 Management

1.1 General management

1.1.1 The operator shall manage and operate the activities:

(a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and

(b) using sufficient competent persons and resources.

1.1.2 Records demonstrating compliance with condition 1.1.1 shall be maintained.

1.1.3 Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out.

1.1.4 The operator shall comply with the requirements of an approved competence scheme.

1.2 Energy efficiency

1.2.1 The operator shall:

(a) take appropriate measures to ensure that energy is used efficiently in the activities;

(b) review and record at least every four years whether there are suitable opportunities to improve the energy efficiency of the activities; and

(c) take any further appropriate measures identified by a review.

1.3 Efficient use of raw materials

1.3.1 The operator shall:

(a) take appropriate measures to ensure that raw materials and water are used efficiently in the activities;

(b) maintain records of raw materials and water used in the activities;

(c) review and record at least every four years whether there are suitable alternative materials that could reduce environmental impact or opportunities to improve the efficiency of raw material and water use; and

(d) take any further appropriate measures identified by a review.

1.4 Avoidance, recovery and disposal of wastes produced by the activities

1.4.1 The operator shall take appropriate measures to ensure that:

(a) the waste hierarchy referred to in Article 4 of the Waste Framework Directive is applied to the generation of waste by the activities; and

(b) any waste generated by the activities is treated in accordance with the waste hierarchy referred to in Article 4 of the Waste Framework Directive; and

(c) where disposal is necessary, this is undertaken in a manner which minimises its impact on the environment.

1.4.2 The operator shall review and record at least every four years whether changes to those measures should be made and take any further appropriate measures identified by a review.

2 Operations

2.1 Permitted activities

2.1.1 The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the "activities").

2.1.2 Waste authorised by this permit shall be clearly distinguished from any other waste on the site.

2.2 The site

2.2.1 The activities shall not extend beyond the site, being the land shown edged in green on site plan A at schedule 7 to this permit.

2.3 Operating techniques

2.3.1 (a) The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by the Environment Agency.

(b) If notified by the Environment Agency that the activities are giving rise to pollution, the operator shall submit to the Environment Agency for approval within the period specified, a revision of any plan or other documentation ("plan") specified in schedule 1, table S1.2 or otherwise required under this permit which identifies and minimises the risks of pollution relevant to that plan , and shall implement the approved revised plan in place of the original from the date of approval, unless otherwise agreed in writing by the Environment Agency.

2.3.3 Waste shall only be accepted if:

(a) it is of a type and quantity listed in schedule 2 table S2.2; and

(b) it conforms to the description in the documentation supplied by the producer and holder.

2.3.4 The operator shall ensure that where waste produced by the activities is sent to a relevant waste operation, that operation is provided with the following information, prior to the receipt of the waste:

(a) the nature of the process producing the waste;

(b) the composition of the waste;

(c) the handling requirements of the waste;

(d) the hazardous property associated with the waste, if applicable; and

(e) the waste code of the waste.

2.3.5 The operator shall ensure that where waste produced by the activities is sent to a landfill site, it meets the waste acceptance criteria for that landfill.

Hazardous waste storage and treatment

2.3.6 Hazardous waste shall not be mixed, either with a different category of hazardous waste or with other waste, substances or materials, unless it is authorised by schedule 1 table S1.1 and appropriate measures are taken.

2.4 Improvement programme

2.4.1 The operator shall complete the improvements specified in schedule 1 table S1.3 by the date specified in that table unless otherwise agreed in writing by the Environment Agency.

2.4.2 Except in the case of an improvement which consists only of a submission to the Environment Agency, the operator shall notify the Environment Agency within 14 days of completion of each improvement.

3 Emissions and monitoring

3.1 Emissions to water, air or land

3.1.1 Periodic monitoring shall be carried out at least once every 5 years for groundwater and 10 years for soil, unless such monitoring is based on a systematic appraisal of the risk of contamination.

3.2 Emissions of substances not controlled by emission limits

3.2.1 Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.

3.2.2 The operator shall:

(a) if notified by the Environment Agency that the activities are giving rise to pollution, submit to the Environment Agency for approval within the period specified, an emissions management plan which identifies and minimises the risks of pollution from emissions of substances not controlled by emission limits;

(b) implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.2.3 All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.

3.3 Odour

3.3.1 Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour.

3.3.2 The operator shall:

(a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to odour, submit to the Environment Agency for approval within the period specified, an odour management plan which identifies and minimises the risks of pollution from odour;

(b) implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.4 Noise and vibration

3.4.1 Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan to prevent or where that is not practicable to minimise the noise and vibration.

3.4.2 The operator shall:

(a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to noise and vibration, submit to the Environment Agency for approval within the period specified, a noise and vibration management plan which identifies and minimises the risks of pollution from noise and vibration;

(b) implement the approved noise and vibration management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

4 Information

4.1 Records

4.1.1 All records required to be made by this permit shall:

(a) be legible;

(b) be made as soon as reasonably practicable;

(c) if amended, be amended in such a way that the original and any subsequent amendments remain legible, or are capable of retrieval; and

(d) be retained, unless otherwise agreed in writing by the Environment Agency, for at least 6 years from the date when the records were made, or in the case of the following records until permit surrender:

(i) off-site environmental effects; and

(ii) matters which affect the condition of the land and groundwater.

4.1.2 The operator shall keep on site all records, plans and the management system required to be maintained by this permit, unless otherwise agreed in writing by the Environment Agency.

4.2 Reporting

4.2.1 The operator shall send all reports and notifications required by the permit to the Environment Agency using the contact details supplied in writing by the Environment Agency.

4.2.2 A report or reports on the performance of the activities over the previous year shall be submitted to the Environment Agency by 31 January (or other date agreed in writing by the Environment Agency) each year. The report(s) shall include as a minimum:

(a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data;

(b) the annual production /treatment data set out in schedule 4 table S4.2; and

(c) the performance parameters set out in schedule 4 table S4.3 using the forms specified in table S4.4 of that schedule.

4.2.3 Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by the Environment Agency, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:

(a) in respect of the parameters and emission points specified in schedule 4 table S4.1;

(b) for the reporting periods specified in schedule 4 table S4.1 and using the forms specified in schedule 4 table S4.4 ; and

(c) giving the information from such results and assessments as may be required by the forms specified in those tables.

4.2.4 The operator shall, unless notice under this condition has been served within the preceding four years, submit to the Environment Agency, within six months of receipt of a written notice, a report assessing whether there are other appropriate measures that could be taken to prevent, or where that is not practicable, to minimise pollution.

4.2.5 Within 1 month of the end of each quarter, the operator shall submit to the Environment Agency using the form made available for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it during the previous quarter.

4.3 Notifications

4.3.1 (a) In the event that the operation of the activities gives rise to an incident or accident which significantly affects or may significantly affect the environment, the operator must immediately—

(i) inform the Environment Agency,

(ii) take the measures necessary to limit the environmental consequences of such an incident or accident, and

(iii) take the measures necessary to prevent further possible incidents or accidents;

(b) in the event of a breach of any permit condition the operator must immediately—

(i) inform the Environment Agency, and

(ii) take the measures necessary to ensure that compliance is restored within the shortest possible time;

(c) in the event of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment, the operator must immediately suspend the operation of the activities or the relevant part of it until compliance with the permit conditions has been restored.

4.3.2 Any information provided under condition 4.3.1 shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.

4.3.3 The Environment Agency shall be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange rules:

Where the operator is a registered company:

(a) any change in the operator's trading name, registered name or registered office address; and

(b) any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.

Where the operator is a corporate body other than a registered company:

(a) any change in the operator's name or address; and

(b) any steps taken with a view to the dissolution of the operator.

In any other case:

(a) the death of any of the named operators (where the operator consists of more than one named individual);

(b) any change in the operator's name(s) or address(es); and

(c) any steps taken with a view to the operator, or any one of them, going into bankruptcy, entering into a composition or arrangement with creditors, or, in the case of them being in a partnership, dissolving the partnership.

4.3.4 Where the operator proposes to make a change in the nature or functioning, or an extension of the activities, which may have consequences for the environment and the change is not otherwise the subject of an application for approval under the Regulations or this permit:

(a) the Environment Agency shall be notified at least 14 days before making the change; and

(b) the notification shall contain a description of the proposed change in operation.

4.3.5 The Environment Agency shall be given at least 14 days notice before implementation of any part of the site closure plan.

4.4 Interpretation

4.4.1 In this permit the expressions listed in schedule 6 shall have the meaning given in that schedule.

4.4.2 In this permit references to reports and notifications mean written reports and notifications, except where reference is made to notification being made “without delay”, in which case it may be provided by telephone.

Schedule 1 - Operations

Table S1.1 activities		
Activity listed in Schedule 1 of the EP Regulations	**Description of specified activity**	**Limits of specified activity**
Section 5.3 Part A 1(a)(ii) disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving physico-chemical treatment	**D09** - Physico-chemical treatment not specified elsewhere which results in final compounds or mixtures which are disposed of by any of the operations numbered D01 to D12 **D15** - Storage pending any of the operations numbered D01 to D14 (excluding temporary storage pending collection on the site where it is produced) **R04** - Recycling/reclamation of metals and metal compounds **R13** - Storage of wastes pending any of the operations numbered R01 to R12 (excluding temporary storage pending collection on the site where it is produced).	From receipt of hazardous waste materials on site through processing and storage to dispatch off site for disposal or recovery. Waste types and capacities as specified in table S2.2.

Table S1.2 Operating techniques		
Description	**Parts**	**Date Received**
Application EPR/VP3634VJ/A001	Responses to parts B2 and B3 of the application documents and all supporting information.	22/04/14
Application EPR/VP3634VJ/A001	Response to not duly made request including information on the bund design, OPRA and storage arrangements.	16/06/14
Application EPR/VP3634VJ/A001	Further information supplied by email on waste water tank design and bunding.	10/07/14
Application EPR/VP3634VJ/A001 Response to Schedule 5 request for information	Revised emergency plan, methodologies, risk assessment, project management plan, non-technical summary, site condition report and waste code list.	08/09/14
Application EPR/VP3634VJ/A001 Response to Schedule 5 request for information	Revised site plan showing the new bund design with sump and pipework to waste oil tank and tanker location for offloading liquid wastes.	12/09/14 & 17/09/14
Application EPR/VP3634VJ/A001 Response to Schedule 5 request for information	Letter detailing response to questions dated 01/10/14, revised site plan showing the slope of the bund design, inspection methodology for water wall, check sheets for maintenance and revised sealant detail for the water wall.	02/10/14 & 06/10/14

Table S1.2 Operating techniques		
Description	**Parts**	**Date Received**
Application EPR/VP3634VJ/A001 Response to Schedule 5 request for information	Revised site plan. Letter detailing the response to the Schedule 5 request for information. Revised tank design.	17/10/14

Table S1.3 Improvement programme requirements		
Reference	**Requirement**	**Date**
IP1	The Operator must appoint a technically competent person to direct activities on the site following the 'How to comply with your environmental permit' and 'Regulatory Guidance Series, No.5 - Operator Competence'. The Operators must obtain an Environmental Permit Operator Certificate (EPOC) awarded by the Chartered Institution of Wastes Management. In addition to the above the Operator must provide the appropriate level of competence for a 'high risk operation' in order to demonstrate technical competence as agreed with the Environment Agency.	4 weeks from Permit Issue (17/11/2014) 12 months from Permit Issue (20/10/2015)

Schedule 2 - Waste types, raw materials and fuels

Table S2.1 Raw materials and fuels	
Raw materials and fuel description	**Specification**
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Table S2.2 Permitted waste types and quantities for disposal or recovery of hazardous waste	
Maximum quantity	Annual maximum throughput 2,000 tonnes. Total storage capacity 200 tonnes at any one time.
Waste code	**Description**
16	**WASTES NOT OTHERWISE SPECIFIED IN THE LIST**
16 02	**wastes from electrical and electronic equipment**
16 02 09*	transformers and capacitors containing PCBs
16 02 10*	discarded equipment containing or contaminated by PCBs other than those mentioned in 16 02 09
16 02 13*	discarded equipment containing hazardous components other than those mentioned in 16 02 09 to 16 02 12

Schedule 3 – Emissions and monitoring

There are no point source emissions allowed as a result of the Conditions in this permit, and therefore no relevant limits or associated monitoring requirements

Schedule 4 - Reporting

Parameters, for which reports shall be made, in accordance with conditions of this permit, are listed below.

Table S4.1 Reporting of monitoring data			
Parameter	**Emission or monitoring point/reference**	**Reporting period**	**Period begins**
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Table S4.2: Annual production/treatment	
Parameter	**Units**
Hazardous waste accepted	Tonnes and number of individual transformer units received

Table S4.3 Performance parameters		
Parameter	**Frequency of assessment**	**Units**
Metals sent for offsite disposal/recovery	Annually	Tonnes
Hazardous waste sent for offsite disposal	Annually	Tonnes

Table S4.4 Reporting forms		
Media/parameter	**Reporting format**	**Date of form**
Other performance indicators	Form performance 1 or other form as agreed in writing by the Environment Agency	20/10/14

Schedule 5 - Notification

These pages outline the information that the operator must provide.

Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

If any information is considered commercially confidential, it should be separated from non-confidential information, supplied on a separate sheet and accompanied by an application for commercial confidentiality under the provisions of the EP Regulations.

Part A

Permit Number	**EPR/VP3634VJ**
Name of operator	**Erith Contractors Limited**
Location of Facility	**Manor Way, Erith, Kent, DA8 2AW**
Time and date of the detection	

(a) Notification requirements for any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution	
To be notified within 24 hours of detection	
Date and time of the event	
Reference or description of the location of the event	
Description of where any release into the environment took place	
Substances(s) potentially released	
Best estimate of the quantity or rate of release of substances	
Measures taken, or intended to be taken, to stop any emission	
Description of the failure or accident.	

(b) Notification requirements for the breach of a limit	
To be notified within 24 hours of detection unless otherwise specified below	
Emission point reference/ source	
Parameter(s)	
Limit	
Measured value and uncertainty	
Date and time of monitoring	
Measures taken, or intended to be taken, to stop the emission	

Drafting Note: The time periods for notification should be based on the site-specific risk and deviations from 24 hours should be justified.

Time periods for notification following detection of a breach of a limit	
Parameter	**Notification period**

(c) Notification requirements for the detection of any significant adverse environmental effect	
To be notified within 24 hours of detection	
Description of where the effect on the environment was detected	
Substances(s) detected	
Concentrations of substances detected	
Date of monitoring/sampling	

Part B - to be submitted as soon as practicable

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident	
Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission	
The dates of any unauthorised emissions from the facility in the preceding 24 months.	

Name*	
Post	
Signature	
Date	

* authorised to sign on behalf of the operator

Schedule 6 - Interpretation

"accident" means an accident that may result in pollution.

"application" means the application for this permit, together with any additional information supplied by the operator as part of the application and any response to a notice served under Schedule 5 to the EP Regulations.

"authorised officer" means any person authorised by the Environment Agency under section 108(1) of The Environment Act 1995 to exercise, in accordance with the terms of any such authorisation, any power specified in section 108(4) of that Act.

"disposal". Means any of the operations provided for in Annex I to Directive 2008/98/EC of the European Parliament and of the Council on waste.

"EP Regulations" means The Environmental Permitting (England and Wales) Regulations SI 2010 No.675 and words and expressions used in this permit which are also used in the Regulations have the same meanings as in those Regulations.

"emissions of substances not controlled by emission limits" means emissions of substances to air, water or land from the activities, either from the emission points specified in schedule 3 or from other localised or diffuse sources, which are not controlled by an emission or background concentration limit**.**

"groundwater" means all water, which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil.

"hazardous property" has the meaning given in Schedule 3 of the Hazardous Waste (England and Wales) Regulations 2005 No.894 and the Hazardous Waste (Wales) Regulations 2005 No. 1806 (W.138).

"Industrial Emissions Directive" *means DIRECTIVE 2010/75/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 24 November 2010 on industrial emissions*

"quarter" means a calendar year quarter commencing on 1 January, 1 April, 1 July or 1 October.

"recovery" means any of the operations provided for in Annex II to Directive 2008/98/EC of the European Parliament and of the Council on waste.

"Waste code" means the six digit code referable to a type of waste in accordance with the List of Wastes (England)Regulations 2005, or List of Wastes (Wales) Regulations 2005, as appropriate, and in relation to hazardous waste, includes the asterisk.

"Waste Framework Directive" or "WFD" means Waste Framework Directive 2008/98/EC of the European Parliament and of the Council on waste

"year" means calendar year ending 31 December.

Where a minimum limit is set for any emission parameter, for example pH, reference to exceeding the limit shall mean that the parameter shall not be less than that limit.

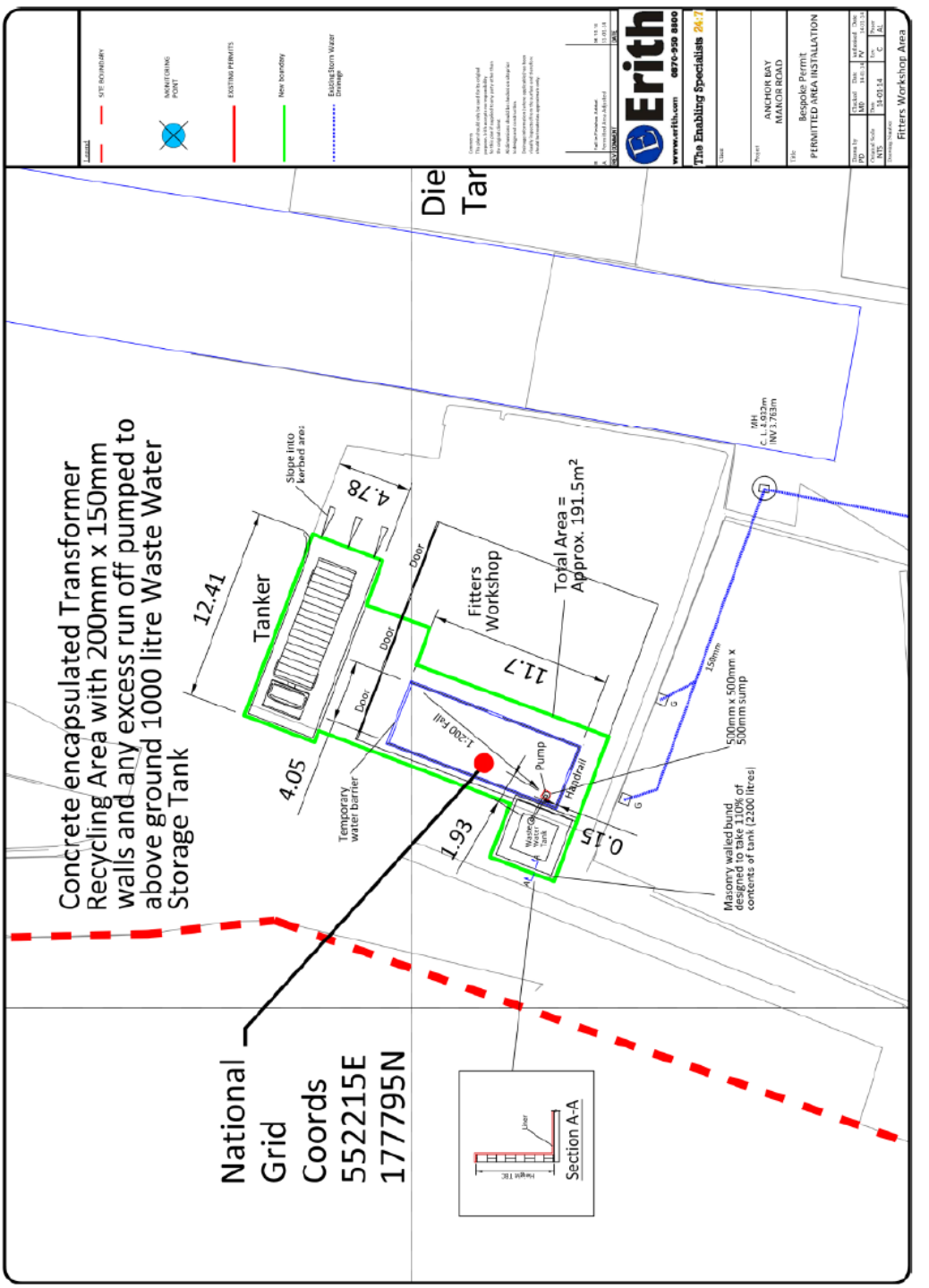
Unless otherwise stated, any references in this permit to concentrations of substances in emissions into air means:

(a) in relation to emissions from combustion processes, the concentration in dry air at a temperature of 273K, at a pressure of 101.3 kPa and with an oxygen content of 3% dry for liquid and gaseous fuels, 6% dry for solid fuels; and/or

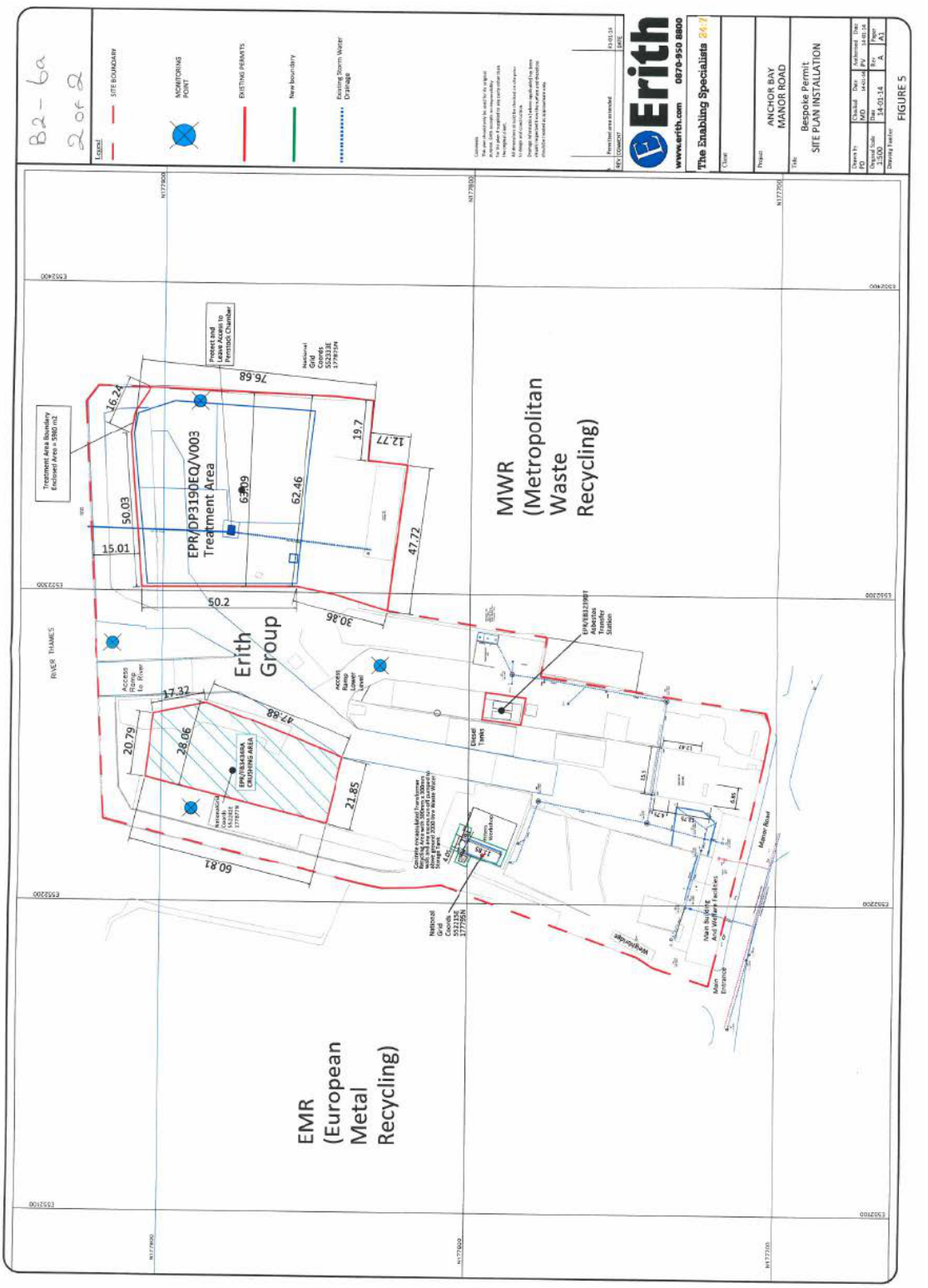
(b) in relation to emissions from non-combustion sources, the concentration at a temperature of 273K and at a pressure of 101.3 kPa, with no correction for water vapour content.

Schedule 7 - Site plan

Site Plan A installation boundary



Site Plan B site boundary and neighbouring permits



END OF PERMIT